

Comments on NAB Petition for Rulemaking: RM-11338Our Three Sons Broadcasting, Rock Hill,
South Carolina
WRHI Radio, Rock Hill, SC
August 2006

Our Three Sons Broadcasting (OTS), a small independent Radio broadcasting company in South Carolina and licensee of Radio station WRHI-AM, Rock Hill, South Carolina, strongly supports the National Association of Broadcasters (NAB) Petition for Rulemaking to the FCC asking that AM broadcasters be allowed to retransmit their signal on FM translators.

WRHI-AM is a Class IV 1000 watt station with a proud 62 year tradition of public service to the Upstate of South Carolina. Rock Hill is part of York County, South Carolina, a rapidly growing county with the fastest increase in population of any county in the Charlotte, NC metropolitan area. In fact, 22 years ago when OTS became the licensee of WRHI-AM, York County's population was 124,000. Today we have more than 210,000 people with more families arriving everyday. Over that same period York County has seen 3 of its 4 Radio stations either physically move or centralize their operations and programming in Charlotte, North Carolina, leaving only WRHI-AM to meet the local programming needs of Rock Hill and York County, South Carolina.

As our city of license continues its suburban sprawl, the ability of WRHI-AM to reach families with our local York County and South Carolina programming continues to diminish. WRHI was one of the first 600 Radio stations licensed in the U.S., and nearly 62 years later our signal strength is exactly the same as when originally licensed in 1944. We moved our tower in the mid 1990's to more centrally position it to reach our growing population-designed and built a new AM ground system-attempted unsuccessfully to increase power-and have upgraded transmission/audio systems several times attempting to improve our signal reach.

Unfortunately, these initiatives have only marginally improved WRHI's signal. Citizens in the City of York (our county seat that is less than 12 miles from our tower in Rock Hill) can no longer hear WRHI day or night because of interference on the AM dial at 1340. Residents in Fort Mill & Tega Cay (the fastest growing communities in York County, less than 3 "air miles" away) can no longer hear us in early morning hours or at night. Almost daily citizens in our county complain to us that they can no longer hear the school lunch menus, election coverage, weather emergency information, high school football games, local news and local talk programming that WRHI-AM provides each day. These citizens also complain to our advertisers and that's resulted in a negative impact on our revenue.

Simply stated: our 1000 watts of power is grossly inadequate to overcome the now ever present AM band interference, or to reach our rapidly expanding population day or night. Despite the

considerable investment we as owner-operators have made over the years to maximize our allotted output we just can't match the challenge which York County's growth presents. In addition, noticeable signal interference (day & especially night) from multiple sources has steadily increased as our community grows, making the quality of our AM signal non competitive with higher power stations in neighboring Charlotte, NC-none of which address local issues here in York County, SC. And being licensed on the crowded AM 1340 frequency makes WRHI's nighttime service virtually impossible to hear outside a 2-3 mile radius because of severe skywave interference.

Under current FCC rules the ONLY solution available to OTS is the acquisition of other AM or FM stations to rebroadcast our WRHI-AM programming. But as you might imagine, this is NOT a viable alternative for smaller market, independent broadcasters like ourselves with limited financial resources.

However, the interference challenge facing WRHI-AM could be greatly overcome by the FCC approving retransmission of AM signals on FM translators as proposed by the NAB. Such authorization would especially benefit low power AM stations like WRHI by allowing us to reach an expanding population that can't presently hear us, with a signal virtually free from interference. This not only allows us to meet the FCC mandate of "service to the public," but allows small, independents like OTS to better compete with the huge broadcast conglomerates which now dominate our marketplace.

Over the years the FCC has brought FM Radio service to many communities with adoption of the 80-90 docket, and did the same for television with LPTV. By expanding the AM band, the FCC attempted to clean-up some of the growing interference on the AM dial. But there was only limited success. Now by approving the NAB petition to allow AM programming on FM translators, the FCC could "finish what it started".

Current FCC rules allow FM stations to rebroadcast AM programming (and vice versa), and FM programming can be rebroadcast on FM translators. In today's highly competitive marketplace, eliminating an antiquated restriction which prohibits AM programming on FM translators, seems only to make sense. By doing so, the FCC would allow communities like Rock Hill and York County, SC to receive the local service they once had and deserve again.. Maintaining the status quo simply is "discriminatory" toward struggling low power AM stations trying earnestly to serve their communities, and makes no sense in the terrestrial and satellite marketplace we compete in today.

WRHI Radio has faithfully served Rock Hill for nearly 62 years and now is the ONLY independent community broadcaster remaining in York, Chester and Lancaster counties, South Carolina. As owner-operators of WRHI-AM for 22 years we have insured this Radio station maintains its STRONG heritage of community service, and exemplifies what the FCC's long-standing goal of localism in

broadcasting is all about. But obstacles such as this outdated FCC rule need to be removed so we can continue our mission.

Our Three Sons Broadcasting supports the National Association of Broadcasters Petition for Rulemaking, and urges the FCC to allow AM broadcasters to retransmit their signals on FM translators.

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